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9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 COMMISSIONER OF INSURANCE FOR
THE STATE OF NEVADA AS RECEIVER
12 OF LEWIS AND CLARK LTC RISK
RETENTION GROUP, INC.,

13 Plaintiff,

14 v.

15 IRONSHORE SPECIALTY INSURANCE
COMPANY; INDIAN HARBOR
16 INSURANCE COMPANY f/k/a CATLIN
INSURANCE COMPANY INC.; ILLINOIS
17 NATIONAL INSURANCE COMPANY; RSUI
INDEMNITY COMPANY; ENDURANCE
18 AMERICAN SPECIALTY INSURANCE
COMPANY; US RE CONSULTING
19 AGENCY SERVICES, INC., a Nevada
corporation; UNI-TER UNDERWRITING
20 MANAGEMENT CORP., UNI-TER CLAIMS
SERVICES CORP., U.S. RE CORPORATION;
21 LEWIS & CLARK LTC RISK RETENTION
GROUP INC., a Nevada corporation; TAL
22 PICCIONE, an individual; DOES 1 through
100, and each of them, inclusive; ROE
23 COMPANIES 1through 100, and each of them,
inclusive,

24 Defendants.

Case No. 2:25-cv-00789

**STIPULATION FOR ENLARGEMENT OF
TIME FOR DEFENDANT IRONSHORE
SPECIALTY INSURANCE COMPANY'S
RESPONSE TO COMPLAINT
(First Request)**

25 Plaintiff, Commissioner of Insurance for the State of Nevada as Receiver of Lewis and Clark
26 LTC Risk Retention Group, Inc. ("Plaintiff" or "Commissioner") and Defendant, Ironshore
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1 Specialty Insurance Company (“Ironshore”), by and through their counsel of record, hereby
2 stipulate and agree as follows:

3 This is the first stipulation to extend the time for Ironshore to respond to Plaintiff’s
4 Complaint.

5 Plaintiff served the Division of Insurance with the Summons and Complaint on April 16,
6 2025. NRS 680A.260(1). The next day on April 17, 2025 the Division of Insurance forwarded the
7 Summons and Complaint to Ironshore’s registered agent. *Id.*, at (2). On April 17, 2025, service on
8 Ironshore was complete. The deadline for Ironshore to respond to the Complaint is April 16, 2025.
9 *Id.* at (3); FRCP 81(c). On May 13, 2025, as a matter of professional courtesy, Plaintiff granted
10 Ironshore up to and including May 30, 2025 to respond to its Complaint.

11 Good cause exists to extend the deadline for Ironshore to respond to the Complaint. Lead
12 counsel for Ironshore will be out of the office on vacation when the response to the Complaint is
13 due. The extra time is needed to better prioritize her workload as she meets firm deadlines in other
14 matters prior to her departure. Although Ironshore’s counsel has been diligent in evaluating
15 Plaintiff’s Complaint, given the fact pattern alleged and the causes of action asserted by Plaintiff,
16 additional time is needed for Ironshore to fairly and adequately respond to the Complaint.

17 By entering into this stipulation Plaintiff does not waive, or intend to waive, any rights in
18 this matter, including, without limitation, any and all rights related to Plaintiff’s ability to seek
19 remand of this matter to the Eighth Judicial District Court (“State Court”) in Nevada pursuant to 28
20 U.S.C. section 1447, or any other right or remedy, which Plaintiff expressly reserves.

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1 Counsel certifies that this request is made in good faith and not for the purposes of delay and
2 request that it be granted by the Court.

3 DATED this day of 14th day of May, 2025

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5 **WILSON, ELSER, MOSKOWITZ, EDELMAN
& DICKER LLP**

6
7 BY: /s/Nicholas F. Adams

8 Sheri M. Thome, Esq.

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13 Las Vegas, Nevada 89119

14 *Attorneys for Defendant Ironshore Specialty
Insurance Company*

15 DATED this day of 14th day of May, 2024

16
17 **WIRTHLIN & VERLAINE**

18 BY: /s/Brenoch R. Wirthlin

19 Brenoch R. Wirthlin, Esq.

20 Nevada Bar No. 10282

21 400 S. 4th Street Suite 300 Spanish Ridge Ave.

22 Las Vegas, Nevada 89101

23 *Attorneys for Plaintiff*

24
25 **ORDER**

26 **IT IS SO ORDERED.**

27 DATED this 14th day of May, 2025.

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UNITED STATES MAGISTRATE JUDGE